

7/27/07

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Attorneys for Defendant

FRANKLIN K. MUKAI

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD., a  
Japanese corporation,

Plaintiff,

vs.

OK HOTEL, LLC, a Hawai'i  
limited liability company, KG  
HOLDINGS LLC, a Hawai'i  
limited liability company,  
FRANKLIN K. MUKAI,

Defendants,

and

CIVIL NO. 04-00124 ACK/BMK

DEFENDANT FRANKLIN K.  
MUKAI'S RESPONSES TO  
PLAINTIFF AND THIRD-PARTY  
DEFENDANT SPORTS SHINKO  
CO., LTD.'S FIRST REQUEST  
FOR ANSWERS TO  
INTERROGATORIES DATED  
5/8/07; EXHIBIT "A"

EXHIBIT

20

2. Identify all actions taken by You and all investigation conducted by You, as a director of the SS Hawai'i Entities, to ensure that the SS-KG Transfers resulted in the highest reasonably attainable price for the SS Properties, including but not limited to an accounting of the amount of time You devoted to such actions and investigation.

RESPONSE:

Defendant Mukai objects to this interrogatory on the grounds that it is overly broad, unreasonably burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving this objection, Defendant Mukai states that he was not a director at the time of the SS-KG Transfers. Additionally, Defendant Mukai states that he was not requested by the client to evaluate the financial aspects of the transaction, such as price. Defendant Mukai understood and believes that the price was a product of arms-length negotiations by or on behalf of Toshio Kinoshita and representatives of the Kobayashi Group.

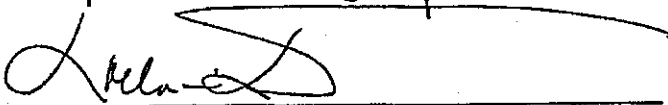
VERIFICATION

STATE OF HAWAII )  
 ) SS.  
CITY AND COUNTY OF HONOLULU )

FRANKLIN K. MUKAI, being first duly sworn on oath,  
deposes and says that he has read the foregoing answers to  
interrogatories and that the same are true to the best of his  
knowledge, information and belief.

  
FRANKLIN K. MUKAI

Subscribed and sworn to before me  
this 27<sup>th</sup> day of July, 2007.

W.   
\_\_\_\_\_  
Notary Public, State of Hawaii

Printed Name of Notary: NOELANI N. JINBO

My commission expires: 9/27/2010